

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**PEERLESS INDEMNITY INSURANCE
COMPANY, f/k/a ATLAS ASSURANCE
COMPANY OF AMERICA**

Plaintiffs,

v.

**AXA GENERAL INSURANCE HONG
KONG LIMITED f/k/a UNION
INSURANCE SOCIETY OF HONG KONG,
as successor in interest to GUARDIAN
REINSURANCE COMPANY, ZURICH**

Defendants.

Case No: 7638- CV – 07

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Michael R. Nelson, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Michael J. Kurtis
Firm Name: Nelson Levine de Luca & Horst
Address: Four Sentry Parkway, Suite 300
City/State/Zip: Blue Bell, PA 19422
Telephone/Fax: (610-862-6539; (610) 862-6501

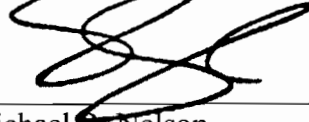
Michael J. Kurtis is a member in good standing of the Bar of the States of Pennsylvania.

626110 #25- 9-5-07 mca

There are no pending disciplinary proceedings against Michael J. Kurtis in any State or Federal Court.

Dated:
City, State:

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'MR Nelson', written over a horizontal line.

Michael R. Nelson
SDNY Bar: 609677
Nelson Levine de Luca & Horst
Four Sentry Parkway, Suite 300
Blue Bell, PA 19422
Phone: (610) 862-6560
Fax: (610) 862-6501

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**AFFIDAVIT OF
MICHAEL R. NELSON
IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
) ss:
County of New York)

Michael R. Nelson, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Nelson Levine de Luca & Horst, counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Michael J. Kurtis as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of Pennsylvania, and was admitted to practice law November 24, 1992. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Michael J. Kurtis since 2004.
4. Mr. Kurtis is an Associate at Nelson Levine de Luca & Horst, in Blue Bell, Pennsylvania.

5. I have found Mr. Kurtis to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Michael J. Kurtis, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Michael J. Kurtis, pro hac vice, which is attached hereto as Exhibit A.

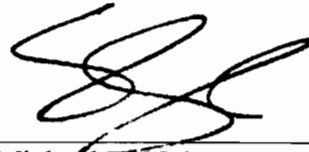
WHEREFORE it is respectfully requested that the motion to admit Michael J. Kurtis, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Date:

City, State:

Notarized:

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'MR Nelson', written over a horizontal line.

Michael R. Nelson

SDNY Bar Code: 609677

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CERTIFICATE OF SERVICE

I, Michael J. Kurtis, hereby certify that a true and correct copy of the Motion for Pro Hac Vice was served on September 4, 2007, upon counsel listed below by United States Mail, postage prepaid.

AXA General Insurance Hong Kong Ltd
30/F PCCW Tower
Taikoo Place
979 King's Road
Quarry Bay
Hong Kong

Respectfully Submitted,

NELSON LEVINE de LUCA & HORST, LLC

BY: 

MICHAEL J. KURTIS
ATTORNEYS FOR PLAINTIFF
PEERLESS INDEMNITY INSURANCE
COMPANY

Dated: September 4, 2007



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Michael J. Kurtis, Esq.

DATE OF ADMISSION

June 25, 2001

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 27, 2007


Patricia A. Johnson
Chief Clerk

Supreme Court of New Jersey

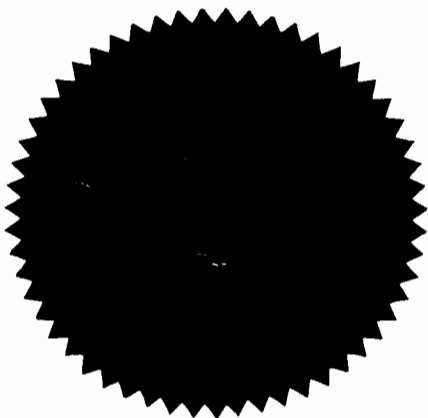


Certificate of Good Standing

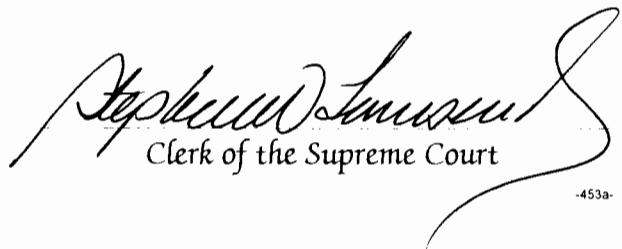
This is to certify that **MICHAEL J KURTIS**
(No. **040891999**) was constituted and appointed an Attorney at Law of New
Jersey on **January 07, 2000** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
28TH day of **August** , 20 **07**


Clerk of the Supreme Court

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**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon Motion of Michael R. Nelson, attorney for Liberty Mutual Insurance Company and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Michael J. Kurtis
Firm Name: Nelson Levine de Luca & Horst
Address: Four Sentry Parkway, Suite 300
City/State/Zip: Blue Bell, PA 19422
Telephone/Fax: (610-862-6539; (610) 862-6501
E-Mail Address: mkurtis@nldhlaw.com

is admitted to practice pro hac vice as counsel for Liberty Mutual Insurance Company in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case

Filing (ECF) system, counsel shall immediately apply for an ECF password at nyusd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge